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October 14, 2005

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

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Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- (1) Name and address of manufacturer:
Pharmavite LLC, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):

A major cartilage component that may help symptoms of joint discomfort by showing the breakdown and enhancing the build-up and stabilization of cartilage. Chondroitin, in a process involving its attachment to glucosamine, plays a role in catching and holding water in the cartilage, contributing to its resilience.

Chondroitin - it attracts fluid in the cartilage, helping resiliency and flexibility.

- (3) Name of the dietary ingredient(s):
Chondroitin (from Sodium Chondroitin Sulfate)
- (4) Name of the dietary supplement(s):
TripleFlex or products containing the above ingredients as a single ingredient or in combination with other ingredients.

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Aims

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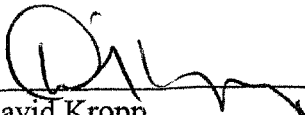


®
PHARMAVITE

The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, Kirkland Signature, Nature Made, Nature's Resource, Nutri Plus, Olay, Spring Valley, Target, TruNature, Walgreens.

We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,



David Kropp
Director, Regulatory Affairs

cc. P. Bolar